

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

DEFENDANT'S MOTION FOR IMPOUNDMENT

Defendant and counterclaim plaintiff Voice Signal Technologies, Inc. (“Voice Signal”) moves pursuant to Local Rule 7.2 and section 14 of the parties’ agreed-to Protective Order for an order impounding Exhibits A, B and C to the Declaration of Wendy S. Plotkin filed in support of Voice Signal’s Reply to Plaintiff’s Response to Objections to the Magistrate Judge’s Order Requiring Trade Secret Discovery (the “Reply”). As grounds for this motion, Voice Signal states that Exhibits A, B, and C are documents produced by ScanSoft that have been designated “Highly Confidential.” Pursuant to section 14 of the parties’ Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose materials designated “Confidential” or “Highly Confidential” must be filed under seal. In addition, Voice Signal refers to quotations from Exhibits, A, B and C in its Reply. Voice Signal will redact the “Highly Confidential” information from the copy of the Memorandum that will be filed electronically and will file an unredacted copy of the Reply by hand with the Court under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding Exhibits A, B and C to the Declaration of Wendy S. Plotkin filed in support of Voice Signal's Reply to Plaintiff's Response to Objections to the Magistrate Judge's Order Requiring Trade Secret Discovery. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file Exhibits A, B and C to the Declaration of Wendy S. Plotkin under seal concurrently with this motion for impoundment.

Respectfully submitted,

Dated: May 12, 2005

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

Robert S. Frank, Jr. (BBO No. 177240)
Sarah Chapin Columbia (BBO No. 550155)
Paul D. Popeo (BBO No. 567727)
Paul E. Bonanno (BBO No. 646838)
Wendy S. Plotkin (BBO No. 647716)
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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on May 12, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Wendy S. Plotkin